

# **EXHIBIT 45**



## Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

December 20, 2024

**RE: Notice of Filing of Discrimination Complaint**  
CRD Matter Number: 202412-27269003  
Right to Sue: Lively / Wayfarer Studios LLC et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department

CRD - ENF 80 RS (Revised 2024/05)

CONFIDENTIAL

BBKOSLOW-000006017  
BBKOSLOW-000006017



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December 20, 2024

Blake Lively

RE: **Notice of Case Closure and Right to Sue**  
CRD Matter Number: 202412-27269003  
Right to Sue: Lively / Wayfarer Studios LLC et al.

Dear Blake Lively:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective December 20, 2024 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

CRD - ENF 80 RS (Revised 2024/05)

**COMPLAINT OF EMPLOYMENT DISCRIMINATION  
BEFORE THE STATE OF CALIFORNIA  
Civil Rights Department  
Under the California Fair Employment and Housing Act  
(Gov. Code, § 12900 et seq.)**

**In the Matter of the Complaint of**

Blake Lively

CRD No. 202412-27269003

Complainant,

vs.

Wayfarer Studios LLC

,

Justin Baldoni

,

Jamey Heath

,

Steve Sarowitz

,

Melissa Nathan

,

The Agency Group PR LLC

,

Jennifer Abel

,

RWA Communications LLC

,

Jed Wallace

,

Street Relations Inc.

,

Respondents

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*Complaint – CRD No. 202412-27269003*

Date Filed: December 20, 2024

CRD-ENF 80 RS (Revised 2024/05)

1. Respondent **Wayfarer Studios LLC** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming **Justin Baldoni** individual as Co-Respondent(s).  
 Complainant is naming **Jamey Heath** individual as Co-Respondent(s).  
 Complainant is naming **Steve Sarowitz** individual as Co-Respondent(s).  
 Complainant is naming **Melissa Nathan** individual as Co-Respondent(s).  
 Complainant is naming **The Agency Group PR LLC** business as Co-Respondent(s).  
 Complainant is naming **Jennifer Abel** individual as Co-Respondent(s).  
 Complainant is naming **RWA Communications LLC** business as Co-Respondent(s).  
 Complainant is naming **Jed Wallace** individual as Co-Respondent(s).  
 Complainant is naming **Street Relations Inc.** business as Co-Respondent(s).

3. Complainant **Blake Lively**, resides in the City of , State of .

4. Complainant alleges that on or about **December 20, 2024**, respondent took the following adverse actions:

**Complainant was harassed** because of complainant's sex/gender, sexual harassment-hostile environment.

**Complainant experienced retaliation** because complainant reported or resisted any form of discrimination or harassment and as a result was other adverse action(s).

**Additional Complaint Details:** Complainant Blake Lively alleges that Respondents Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, Melissa Nathan, the Agency Group PR LLC, Jennifer Abel, RWA Communications LLC, Jed Wallace, and/or Street Relations Inc. engaged in a variety of conduct in violation of California Government Code section 12940 (the "FEHA") and Title VII of the Civil Rights Act of 1964 ("Title VII"). The conduct includes: sexual harassment; retaliation; failure to investigate, prevent, and/or remedy harassment; and aiding and abetting harassment and retaliation. Please see attached complaint for specific details.

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*Complaint – CRD No. 202412-27269003*

Date Filed: December 20, 2024

CRD-ENF 80 RS (Revised 2024/05)

1 VERIFICATION

2 I, **Esra Hudson**, am the **Attorney** in the above-entitled complaint. I have read the  
3 foregoing complaint and know the contents thereof. The matters alleged are based  
4 on information and belief, which I believe to be true.

5 On December 20, 2024, I declare under penalty of perjury under the laws of the State  
6 of California that the foregoing is true and correct.

7 **Los Angeles, CA**  
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27 *Complaint – CRD No. 202412-27269003*

28 Date Filed: December 20, 2024

CRD-ENF 80 RS (Revised 2024/05)